

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF VIRGINIA  
Harrisonburg Division

CONSUMER FINANCIAL PROTECTION  
BUREAU, et al.,

Plaintiffs,

v.

NEXUS SERVICES, INC., et al.,

Defendants.

Case No.: 5:21-cv-00016-EKD-JCH

**PLAINTIFFS' MOTION FOR AN EXTENSION OF TIME TO FILE A REPLY IN  
SUPPORT OF THEIR MOTION FOR AN ORDER TO SHOW CAUSE**

Plaintiffs the Consumer Financial Protection Bureau, the Commonwealth of Massachusetts, the People of the State of New York, and the Commonwealth of Virginia hereby move for an extension of time to file a reply in support of their Motion for an Order to Show Cause Why Defendants and Libre Immigration Services, Inc., Should Not Be Held in Contempt, ECF No. 260. In support of the requested extension, Plaintiffs state:

1. On May 28, 2024, Plaintiffs moved for an order to show cause why Defendants in this case and Libre Immigration Services, Inc., (LIS) should not be held in contempt of this Court's Amended Final Judgment Order, ECF No. 246. Defendants were served via this Court's CM/ECF system, and Plaintiffs served LIS via email on June 3, 2024. *See* Certificate of Service, ECF No. 263.

2. On June 12, 2024, Defendants filed an opposition to Plaintiffs' motion. *See* ECF No. 265. On June 17, 2024, counsel for LIS filed an affidavit indicating that LIS will rely on the same factual and legal bases to oppose Plaintiffs' motion. *See* ECF No. 269.

3. By operation of the local rules, Plaintiffs' reply to Defendants' opposition is due on Thursday, June 20, 2024, given the federal holiday on June 19. *See* W.D. Va. Civ. R. 11(c)(1).

4. Plaintiffs have several competing obligations that necessitate this request for additional time. In particular, counsel with primary drafting and reviewing responsibilities for the reply brief have needed to handle competing litigation obligations, and accommodate pre-planned vacation late last weekend and later this week before this reply brief is currently due. More time would also better allow counsel for the four different Plaintiffs to confer on the reply brief.

5. Accordingly, Plaintiffs request that this Court extend the deadline to reply to Defendants' and LIS's opposition to Friday, June 28, 2024.

6. This motion has been timely filed in advance of the deadline for Plaintiffs' reply and Defendants and LIS will suffer no prejudice if the extension is granted.

7. As such, good cause exists to grant this motion and extend the deadline for Plaintiffs to file their reply.

8. Plaintiffs emailed counsel for both Defendants and LIS on the afternoon of June 18, asking for their clients' position on the requested extension. As of the time of filing, counsel had not indicated what position Defendants and LIS take on the requested extension.

### **CONCLUSION**

For the foregoing reasons, Plaintiffs respectfully request that the Court extend their deadline to reply to Defendants' and LIS's opposition to their motion for an order to show cause why Defendants and Libre Immigration Services, Inc., should not be held in contempt, to and including June 28, 2024.

Respectfully submitted,

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**CERTIFICATE OF SERVICE**

I hereby certify that on June 18, 2024, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send a notification of such filing to all counsel of record for the parties.

/s/ Stephanie B. Garlock  
Stephanie B. Garlock